

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS**

**SERVICE LLOYDS INSURANCE  
COMPANY**

**Plaintiff,**

**V.**

**NORTH AMERICAN RISK  
SERVICES, INC.**

**Defendant/Third-Party Plaintiff,**

**V.**

**TEE & GEE GROUP, LLC;  
CORECARE MANAGEMENT; AND  
PRIME HEALTH SERVICES, INC.,**

### **Third-Party Defendants.**

**§**

**CIVIL ACTION NO. 1:19-CV-518**

**NARS' RESPONSE TO THIRD-PARTY  
DEFENDANT PRIME HEALTH'S MOTION TO COMPEL**

Defendant/Third-Party Plaintiff North American Risk Services, Inc. (“NARS”) files this Response to Third-Party Defendant Prime Health Services, Inc.’s (“Prime”) Motion to Compel, and would show as follows:

**1.**

NARS does not object to the relief requested in Prime's motion – to have the opportunity to depose NARS employee Tiffany Curry before presenting its corporate representative for deposition. However, NARS does not want to alter the current agreed corporate representative deposition schedule until this Court rules on CoreCare's motion to compel, which NARS opposes. Once this Court rules that CoreCare must present its corporate representative as agreed, then NARS will agree to postpone the deposition of

Prime's corporate representative until after Ms. Curry is deposed. In fact, this is what counsel for NARS informed counsel for Prime before Prime filed its motion, but apparently Prime felt it necessary to proceed with its motion in any event.

Respectfully submitted,

**WINGET, SPADAFORA &  
SCHWARTZBERG, LLP**

By: /s/ Martin S. Schexnayder  
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**COUNSEL FOR DEFENDANT/THIRD-  
PARTY PLAINTIFF NORTH AMERICAN  
RISK SERVICES, INC.**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing instrument has been duly and properly served upon all counsel herein on August 12, 2020, in accordance with the Federal Rules of Civil Procedure.

/s/ Martin S. Schexnayder  
Martin S. Schexnayder